

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20544**

In the Matter of the Federal-State Joint)	
Board on Universal Service)	CC Docket No. 96-45
)	
General Communication, Inc. Request)	
for Clarification of Clerical Changes to)	
47 C.F.R. § 54.307 and for Direction to)	
USAC)	
)	
)	

COMMENTS OF THE ALASKA TELEPHONE ASSOCIATION

In response to the Wireline Competition Bureau's ("WCB") Public Notice released on July 27, 2005, the Alaska Telephone Association ("ATA") offers these brief comments regarding the above-captioned matter.¹

Each ATA member is an incumbent local exchange carrier ("ILEC") providing service in rural Alaska. Matanuska Telephone Association ("MTA"), the most immediate target of General Communication, Inc.'s ("GCI's") crusade to monopolize the telecommunications industry in the state,

¹ ATA recognizes that the due date for reply comments in this proceeding was two days ago. Given the nominal tardiness of this filing, and in the interest of developing a complete record on the matter, ATA respectfully requests that the Commission accept these late filed Reply Comments for inclusion in the record. In the alternative, ATA requests that the Commission treat these Reply Comments as informal comments as permitted under section 1.419(b) of the Commission's Rules.

is the largest of those members. Notwithstanding this fact, MTA's revenues and workforce are only about one-fifth that of GCI. The other ATA members in whose service areas GCI has filed for competitive entry are by magnitudes even smaller.

The June 29, 2005 date of the letter to the Chief of the WCB from GCI's counsel raising this issue (that has apparently gone unnoticed for five years?) might be simply coincidence. More realistically we believe it is because GCI is now engaged in protracted and contentious negotiations with MTA for use of its facilities and sees a competitive advantage to obtaining a policy change.

GCI is a very effective business entity. It is aware, nimble, aggressive and the management does an admirable job for its stockholders as witnessed by the fourfold increase in the value of its shares of stock in the past six years and the statement last February by its president, "This is our eighth consecutive year of record high revenues...."². They "work really hard to hire the best and the brightest telecom lawyers"³ and are so successful that in the last two years they have been able to attract both a former chair of the Regulatory Commission of Alaska ("RCA") and, for contract work, a former

² News Release, *GCI Reports 2004 Financial Results*, 2/23/2005, <http://gci.com/about/gci2004earnings.pdf>.

³ Dana Tindall, Senior Vice President of Legal and Regulatory Affairs, GCI; *Former GCI Regulator Lands Job There*, Anchorage Daily News, 9/15/2004.

RCA hearing officer who was the arbitrator in the GCI/ACS (Alaska Communications Systems) arbitration.

In spite of its significant advantage in capital and staff (GCI has about as many attorneys in-house as MTA has regulatory personnel), GCI recognizes that the policy change it requests in the guise of “correct[ing] the correcting amendment” or “reinstating what was erroneously deleted,” would present an economic hardship to MTA at a time when it needs all available resources to contest with GCI in the regulatory arena. As dubious as its facade may be, GCI is magnificently adept at reaching for any regulatory advantage. This effort is typical of its heritage. Any allegation that its quest to “correct the correction” is in the public interest is disingenuous. GCI seeks only one more competitive advantage in its campaign to supplant the small telephone companies that have provided quality service to rural Alaskans for years.

On behalf of rural Alaskan communities and telephone customers, look closely at the motives of the powerful entity that has requested this policy change – and deny it.

Dated this 2nd day of September 2005.

ALASKA TELEPHONE

ASSOCIATION

By: _____
James Rowe
Executive Director